

*Furnish this exhibit for EACH foreign principal listed in an initial statement
and for EACH additional foreign principal acquired subsequently.*

1. Name and address of registrant Akin, Gump, Strauss, Hauer & Feld 1333 New Hampshire Avenue, NW, Suite 400 Washington, D.C. 20036		2. Registration No. 3492
3. Name of foreign principal Hoylake Investments Limited	4. Principal address of foreign principal 41 Cedar Avenue P.O. Box 1179 Hamilton 5-24 Bermuda	

5. Indicate whether your foreign principal is one of the following type:

☐ Foreign government

☐ Foreign political party

☒ Foreign or ☐ domestic organization: If either, check one of the following:

☐ Partnership

☐ Committee

☒ Corporation

☐ Voluntary group

☐ Association

☐ Other (specify) _____

☐ Individual—State his nationality _____

6. If the foreign principal is a foreign government, state:

a) Branch or agency represented by the registrant.

N/A

b) Name and title of official with whom registrant deals.

7. If the foreign principal is a foreign political party, state:

a) Principal address

N/A

b) Name and title of official with whom the registrant deals.

c) Principal aim

8. If the foreign principal is not a foreign government or a foreign political party,

a) State the nature of the business or activity of this foreign principal

Hoylake Investments Limited was organized specifically for the purpose of acquiring shares in B.A.T. Industries PLC, an English public company. Hoylake Investments Limited is not engaged in any business other than in connection with the acquisition of shares in B.A.T. Industries PLC.

b) Is this foreign principal

- Owned by a foreign government, foreign political party, or other foreign principal Yes ☒ No ☐
- Directed by a foreign government, foreign political party, or other foreign principal..... Yes ☒ No ☐
- Controlled by a foreign government, foreign political party, or other foreign principal Yes ☒ No ☐
- Financed by a foreign government, foreign political party, or other foreign principal..... Yes ☒ No ☐
- Subsidized in whole by a foreign government, foreign political party, or other foreign principal..... Yes ☒ No ☐
- Subsidized in part by a foreign government, foreign political party, or other foreign principal..... Yes ☒ No ☐

9. Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page may be used.)

Hoylake Investments Limited is a wholly-owned subsidiary of Anglo Group PLC, an English company.

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

N/A

Date of Exhibit A

August 16, 1989

Name and Title AKIN, GUMP,
STRAUSS, HAUER & FELD
BY: RICHARD R. RIVERS
Partner with Power of Attorney

Signature

Richard R. Rivers
Partner with
Power of Attorney

INSTRUCTIONS: A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements; or, where no contract exists, a full statement of all the circumstances, by reason of which the registrant is acting as an agent of a foreign principal. This form shall be filed in duplicate for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

Name of Registrant	Name of Foreign Principal
Akin, Gump, Strauss, Hauer & Feld	Hoylake Investments Limited

Check Appropriate Boxes:

- ☐ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach two copies of the contract to this exhibit.
- ☐ There is no formal written contract between the registrant and foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach two copies of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
- ☒ The agreement or understanding between the registrant and foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and the expenses, if any, to be received.

- Describe fully the nature and method of performance of the above indicated agreement or understanding.

For the performance of legal services, the foreign principal will pay the law firm at the standard hourly billing rates of those persons working on its account and reimburse the firm for all routine out-of-pocket expenses.

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WASHINGTON, D.C.

5. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

Representation of Hoylake Investments Limited with respect to its acquisition of shares in B.A.T. Industries PLC.

6. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act?¹
Yes ☒ No ☐

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

Representation of Hoylake Investments Limited on issues related to the effects on operations in the U.S. concerning the proposed acquisition of B.A.T. Industries PLC by Hoylake Investments Limited.

Date of Exhibit B

August 16, 1989

Name and Title

Akin, Gump, Strauss, Hauer
& Feld

By: Richard R. Rivers

Partner with Power of Attorney

Signature

Richard R. Rivers
Partner with
Power of Attorney

¹Political activity as defined in Section 1(o) of the Act means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.